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January 20, 2010

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Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Written Ex Parte Presentation in IB Docket No. 95-91 and WT Docket No. 07-293, and GN Docket Nos. 09-47, 09-51, and 09-137

Dear Ms. Dortch:

As the FCC continues its deliberations on the matter of modifying the technical specifications for the 2.3 GHz Wireless Communications Service ("WCS"), General Motors ("GM") would like to call to your attention our Ex Parte filing back on November 21, 2008. GM would like to reiterate our concern on behalf of our nearly seven million owners of GM vehicles equipped with satellite radio. We believe there is a potential for harmful interference to in-vehicle reception by allowing WCS to operate on frequencies immediately adjacent to these vehicles' satellite radio receivers.

We appreciate the Commission's consideration of these concerns and urge you to protect millions of consumers who rely on satellite radio.

Respectfully submitted,

Gregory A. Ross  
Director - Satellite Services  
General Motors North American Operations

Joanne M. Finnorn  
Attorney  
General Motors Legal Staff

Mail Code: 482-D39-B32  
400 Renaissance Center  
PO Box 400  
Detroit, MI 48265-4000  
313-665-2802

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November 21, 2008

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Written Ex Parte Presentation in IB Docket No. 95-91 and WT Docket  
No. 07-293.

Dear Ms. Dortch:

The FCC's proceeding to modify the technical specifications for the 2.3 GHz Wireless Communications Service ("WCS") is critical to General Motors and the nearly seven million owners of General Motors vehicles equipped with satellite radio. Operating on frequencies immediately adjacent to these vehicles' satellite radio receivers, WCS devices must not be allowed to become a potential source of harmful interference to in-vehicle reception.

Satellite radio programming has proven popular with car buyers; millions of owners having experienced the technology are now subscribers to this important new source of in-vehicle entertainment options.<sup>1</sup> Indeed, automakers have installed and customers have purchased more than twenty million vehicles with satellite radio receivers. Our customers enjoy the variety of programming as well as the high-quality audio that satellite radio offers.

Customers have routinely stated on feedback surveys that their reason for subscribing is the ubiquitous coverage and superior sound quality of satellite radio. Vehicle purchasers have high expectations with satellite radio services in their motor vehicles.

These high expectations will likely be frustrated if the FCC takes an action that would potentially create harmful interference. The proposed rule in the captioned proceedings could significantly impair sound quality by facilitating mobile WCS devices.

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<sup>1</sup> It is important to note that Sirius XM also provide potentially life-saving emergency broadcasting information regardless of whether a vehicle is subscribed. With its satellite-based broadcasting capability, vehicle owners have unparalleled access to crisis information when traditional terrestrial based broadcasting may be lost or limited by damage. General Motors believes the Commission should be especially mindful of the impacts of potential harmful interference with this capability.

Notably, this is a use that was specifically discouraged due to interference concerns when WCS licenses were auctioned by the FCC.<sup>2</sup>

General Motors therefore urges the FCC to be extremely cautious and ensure that satellite radio performance is not degraded by inappropriately changing the established rules for WCS operations. Sirius XM Radio has spent billions of dollars developing networks that - to the best of our knowledge- are based on the understanding that mobile WCS devices would not be allowed to interfere.

Satellite radio is unique among FCC-regulated entities and requires a different level of protection from that provided to other wireless devices such as, for example, cell phones. We ask that the Commission keep in mind the following facts:

- Satellite radio represents an extremely dense concentration of customers in a narrow frequency band (more than 18 million subscribers in 25 MHz), thus amplifying the impact of any interference or signal degradation.
- Satellite radio provides high-quality audio and music where drop-outs and interruptions of the duration and frequency that WCS mobile operations may cause are neither expected nor tolerated by subscribers, in large part because competing non-subscription audio services typically provide error-free service.
- Importantly, satellite radio originates from space-based platforms that provide a relatively low-powered signal to receivers tens of thousands of miles away (thus necessitating receivers more susceptible to impairment from out-of- band emissions). Because repeaters are not available in the vast majority of the country, the satellite signal strength is not being augmented or increased by terrestrial means.
- Unlike mobile handheld devices, most satellite radio antennas are located on top of vehicles and are typically unshielded (thus providing less protection from sources of interference).
- Satellite radios do not use spread spectrum technologies which inherently reduce the impact of interference data packets (thus presenting a signal overload threshold lower than, for example, the typical cell phone).

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<sup>2</sup> Amendment of the Commission's Rules to Establish Part 27, the Wireless Communications Service, Report and Order, FCC 97-50, 12 FCC Rcd 10785, ¶¶ 136, 138 (1997)

We appreciate the Commission's consideration of these concerns and urge the Commission to ensure that the actions taken fully protect GM and the millions of consumers who purchase and enjoy satellite radio services.

Respectfully submitted,

Richard M. Lee  
Executive Director – Satellite Radio Services  
General Motors North American Operations

Joanne M. Finnorn  
Attorney  
General Motors Legal Staff

Mail Code: 482-D39-B32  
400 Renaissance Center  
PO Box 400  
Detroit, Michigan 48265-4000  
313-665-2780